SFUND RECORDS CTR 2212011



CH2M HILL 155 Grand Avenue Suite 1000 Oakland. CA 94612 Tel 510.251.2426 Fax 510.622.9000

April 13, 2009

277085.31.LC/XC2006217A

Ms. Carolyn d'Almeida United States Environmental Protection Agency 75 Hawthorne Street, SFD-7-2 San Francisco, CA 94105

Subject: Polychlorinated Biphenyls at Building 688 UL#02 In Investigation Area C2,

Where No Further Action is Required under the United States Environmental

Protection Agency Consent Agreement and Final Order

Dear Ms. d'Almeida:

CH2M HILL prepared this letter in compliance with the Consent Agreement and Final Order (CA/FO) between United States Environmental Protection Agency (USEPA) and the United States Department of the Navy (Navy), with the City of Vallejo and Lennar Mare Island, LLC (LMI) as intervenors (USEPA et al. 2001). The CA/FO sets forth the polychlorinated biphenyl (PCB)-related requirements that must be met to satisfy the Toxic Substances Control Act (TSCA) for LMI's Eastern Early Transfer Parcel.

Pursuant to Paragraph 6(a) of the CA/FO, the purpose of this letter is to demonstrate that a no further action (NFA) determination under TSCA is appropriate, with respect to PCB contamination, as part of the overall regulatory closure process for PCB Site Building 688 UL#02 on LMI's Eastern Early Transfer Parcel. An NFA determination is appropriate because the Navy performed cleanup actions prior to August 28, 1998, and the remaining PCB concentrations—a maximum total PCB concentration less than 10 milligrams per kilogram (mg/kg) and an average PCB concentration less than 5 mg/kg—are less than the alternative substantive cleanup requirements (SCRs). In accordance with Paragraphs 7 and 8 of the CA/FO, NFA is appropriate for PCB Site Building 688 UL#02, with a land use covenant limiting the property to industrial use.

Site Identification

Using visual site surveys, reviews of historical records, building closure reports, and databases of electrical equipment, the Navy identified sites where PCB-containing equipment was located, PCB spills were documented, or contamination was suspected because of building history or visible stains (Tetra Tech Environmental Management, Inc. [TtEMI] 1998). Navy personnel from Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS) conducted interim PCB assessments and performed cleanup actions (e.g., washing, scabbling) in accordance with technical work documents (TWDs), where necessary.

Building 688, a pump test shop built in 1941, is located east of Railroad Avenue and south of Oklahoma Street (formerly 13th Street) in Investigation Area C2. Building 688 is currently occupied and used for material storage. According to the *Preliminary Land Use Plan* (SWA Group 2000), Building 688 is in an area designated for future industrial use. Figure 1 shows the location of the PCB site.

There are three previously-unidentified PCB sites associated with Building 688 that were not listed in the Consent Agreement signed April 16, 2001 between LMI, the City of Vallejo, and the State of California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) (LMI et al. 2001): UL#01, UL#02, and UL#03. PCB Site Building 688 UL#02 is defined as the building floor stains in the northern, southeastern, and central interior of Building 688. PCB Site Building 688 UL#01 consists of concrete, manholes, soil, and asphalt associated with a transformer pad adjacent to the western exterior wall of Building 688 and is being addressed for closure in a separate submittal. PCB Site UL#03 consists of loose sediment and debris inside covered and steel-lined pits beneath the floor of Building 688 and is being addressed for closure in a separate submittal (Figure 1).

Site Investigations and Cleanup Actions

Table 1 summarizes the previous sampling at Building 688 UL#02. This table includes the sample numbers, matrices, dates, and total PCB concentrations (or laboratory reporting limit if PCBs were not detected).

The following site investigation summary is based on CH2M HILL's review and interpretation of historical information contained in TWDs 95-0328 and 95-0340, which were discovered during transition of Navy documents to LMI prior to commencement of work under the Consent Agreement. From this historical documentation, it appears that in April 1995, SSPORTS performed PCB sampling activities inside Building 688. A hand-annotated, undated figure attached to the TWDs (Attachment 1) appears to show approximately 40 proposed sample locations on the first floor of Building 688; however, there is only documented evidence of four samples being collected based on the laboratory data sheets and proposed actions at two targeted locations presented in the TWDs. The laboratory data sheets for the four samples collected by SSPORTS (5103-0644, -0645, -0667, and -0668) are summarized in Table 1 and are provided with the TWDs for reference in Attachment 1. The approximate location of two of the four samples collected by SSPORTS whose PCB concentrations were 4.09 micrograms per sample area (µg/sample) (5103-0667) and 2.45 μg/sample (5103-0645) were not specifically identified in the TWDs, but their approximate location inside Building 688 has been plotted in Figure 2 using the locations on the hand-annotated figure in TWD 95-0328 (SSPORTS 1995a-b). The location of the remaining two wipe samples was determined from the TWDs. Wipe sample 5103-0668 (15.1 μg/sample) was collected from a stained area in the southwestern part of Building 688, and wipe sample 5103-0644 (11.2 µg/sample) was collected from the stain in the northern part of Building 688 (SSPORTS 1995 a-b) (Figure 2).

As part of TWD 95-0328, SSPORTS decontaminated the stain in the northern part of Building 688 where previous wipe sample location 5103-0644 (11.2 μ g/sample) was collected (SSPORTS 1995b) (Figure 2). The floor stain was double-washed/-rinsed with

industrial-strength detergent or non-ionic surfactant solution (Attachment 1). Additionally, as part of TWD 95-0340, SSPORTS decontaminated a stain in the southeast end of Building 688 where previous wipe sample location 5103-0668 (15.1 μ g/sample) was collected (SSPORTS 1995a) (Figure 2). The floor stain was double-washed/-rinsed with industrial-strength detergent or non-ionic surfactant solution (Attachment 1).

Based on historical laboratory data sheets, in 1996, SSPORTS collected one concrete chip sample (6120-0018) from a stain in the northern part of the building (1.6 mg/kg), one oil sample (6120-0019) from a starting compensator (3.9 parts per million) that was located in the southern portion of the building at that time, and one additional concrete sample (6120-0017) from an unknown location (1.5 mg/kg). Based on visual observations from inside the building, it is believed that the starting compensator from Building 688 was removed prior to CH2M HILL's involvement at the site.

On June 28, 2002, CH2M HILL collected one wipe verification sample (B688UL2WP0273) from the northern stain and one concrete chip verification sample (B688UL2CH0274) from the southeastern stain (Figure 2). PCBs were detected in wipe sample B688UL2WP0273 at a total concentration of 1.32 micrograms per 100 square centimeters (μ g/100 cm²) and in concrete chip sample B688UL2CH0274 at a total concentration of 0.42 mg/kg (Figure 2).

Polychlorinated Biphenyl Site Closure Process

According to the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003), and under TSCA, NFA is appropriate under TSCA at PCB sites where the maximum remaining total PCB concentrations comply with the alternative SCRs provided in Paragraph 8 of the CA/FO. The remaining total PCB concentrations in solid samples meet the alternative SCRs as outlined in CA/FO Paragraph 8(b)(2), which states: "For concrete and wood floors with an average PCB concentration, based on chip samples taken from the surface of dry concrete or wood which was contaminated or presumed contaminated by PCBs, of 5 ppm [parts per million] or less, with a maximum concentration of 10 ppm in any sample, the PCBs in the concrete are disposed of and require no further remediation provided that there shall be a deed restriction limiting the property to industrial use only" (USEPA et al. 2001).

Additionally, NFA is appropriate under TSCA at PCB sites where the maximum remaining total PCB concentrations comply with the default SCRs provided in Paragraph 8 of the CA/FO. The remaining total PCB concentrations in wipe samples meet the default SCRs as outlined in the CA/FO Paragraph 8(a)(i)(A), which states: "For all high occupancy areas (see 40 CFR 761.3): For non-porous surfaces (as defined in 40 CFR 761.3), wipe samples must demonstrate less than $10 \, \mu g/100 \, cm^2$."

Conclusions

The maximum remaining PCB concentration in concrete at PCB Site Building 688 UL#02 is 1.6 mg/kg (6120-0018). The average (defined as the 95 percent upper confidence limit of the mean) remaining PCB concentration at Building 688 UL#02 in concrete is 2.28 mg/kg. Therefore, PCB Site Building 688 UL#02 meets the alternative SCRs presented in Paragraph 8(b)(2) of the CA/FO for porous surfaces, with an average remaining PCB concentration less

than 5 mg/kg and maximum remaining PCB concentration less than 10 mg/kg. NFA with the implementation of an industrial land use covenant is appropriate for PCB Site Building 688 UL#02.

The maximum remaining PCB concentration from a wipe sample at PCB Site Building 688 UL#02 is $4.09 \,\mu\text{g}/100 \,\text{cm}^2$ (5103-0667). It is not known if the wipe sample was collected from the concrete floor or from former equipment. This wipe sample at PCB Site Building 688 UL#02 meets the default SCRs for high occupancy and is presented in Paragraph 8(a)(i)(A) of the CA/FO for non-porous surfaces where wipe samples are less than $10 \,\mu\text{g}/100 \,\text{cm}^2$.

CH2M HILL will prepare the Building 688 UL#02 land use covenant for agency review prior to recordation of the industrial use restriction by LMI. Recordation of a land use covenant would be protective of human health and the environment at Building 688. This covenant will prohibit sensitive land uses of the building and will comply with all applicable PCB-related requirements regarding use, operation and maintenance, and disposal. This land use covenant will be pursuant to Section 67391.1 to Title 22, Division 4.5, Chapter 39 of the California Code of Regulations, executed by DTSC and LMI, and recorded in Solano County. This land use covenant will run with the land and will be enforceable by the DTSC, with USEPA as a third-party beneficiary. Following recordation, the conditions for USEPA closure of PCB sites will be satisfied at this site.

Consequently, CH2M HILL requests that USEPA issue an NFA determination for PCB Site Building 688 UL#02, with implementation of a land use covenant restricting the future use to industrial purposes, in accordance with the alternative SCRs in Paragraph 8(b)(2) of the CA/FO and Title 40 of the Code of Federal Regulations, Part 761.61(c).

Please respond to this letter with confirmation that, in accordance with the approved *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003) and the CA/FO (USEPA et al. 2001), under TSCA, an NFA is appropriate for PCB Site Building 688 UL#02. Please submit your approval of NFA at this site to Stephen Farley at the above address or via email at Stephen-Farley@ch2m.com. If you have questions regarding the PCB site addressed in this letter, please contact Jennifer Lindquist at 530/229-3224 or Stephen Farley at 707/562-1015, extension 103.

Sincerely, CH2M HILL

Jennifer L. Lindquist Project Manager

(B688UL#02_USEPA.doc)

Enclosures: Table 1, Figure 1, and Figure 2

Stephen M. Farley, P.G. Quality Control Manager

teplin Jalley

References

CH2M HILL. 2003. Final Polychlorinated Biphenyl Work Plan. March 7.

- Lennar Mare Island, the City of Vallejo, and the State of California, Environmental Protection Agency Department of Toxic Substances Control. 2001. Consent Agreement between Lennar Mare Island, the City of Vallejo, and the State of California, California Environmental Protection Agency Department of Toxic Substances Control. April 16.
- Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS). 1995a. PCB Decontamination Technical Work Document (TWD) No. 95-0340. June.
- ______. 1995b. PCB Decontamination Technical Work Document (TWD) No. 95-0328. June.
- SWA Group. 2000. Preliminary Land Use Plan. May 23.
- Tetra Tech Environmental Management, Inc. (TtEMI). 1999. Final Basewide Polychlorinated Biphenyl Confirmation Sampling Summary Report. Revised. January.
- United States Environmental Protection Agency, United States Department of the Navy, the City of Vallejo, and Lennar Mare Island. 2001. Complaint/Consent Agreement and Final Order between Lennar Mare Island, the City of Vallejo, the U.S. Department of the Navy, and the U.S. Environmental Protection Agency Region IX. EPA Docket No. TSCA-9-2002-0002. December 20.

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Ms. Paula Tygielski 456 East L Street Benicia, CA 94510

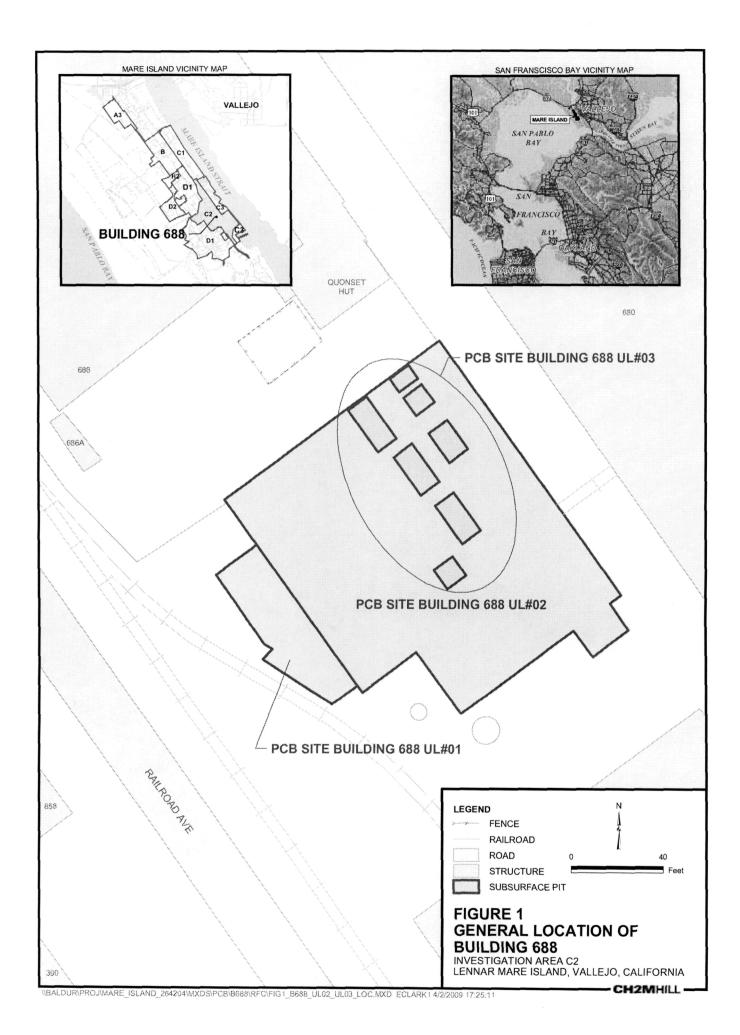
TABLE 1 Sample Results for Building 688 UL#02
PCB Sites, Lennar Mare Island, Vallejo, California

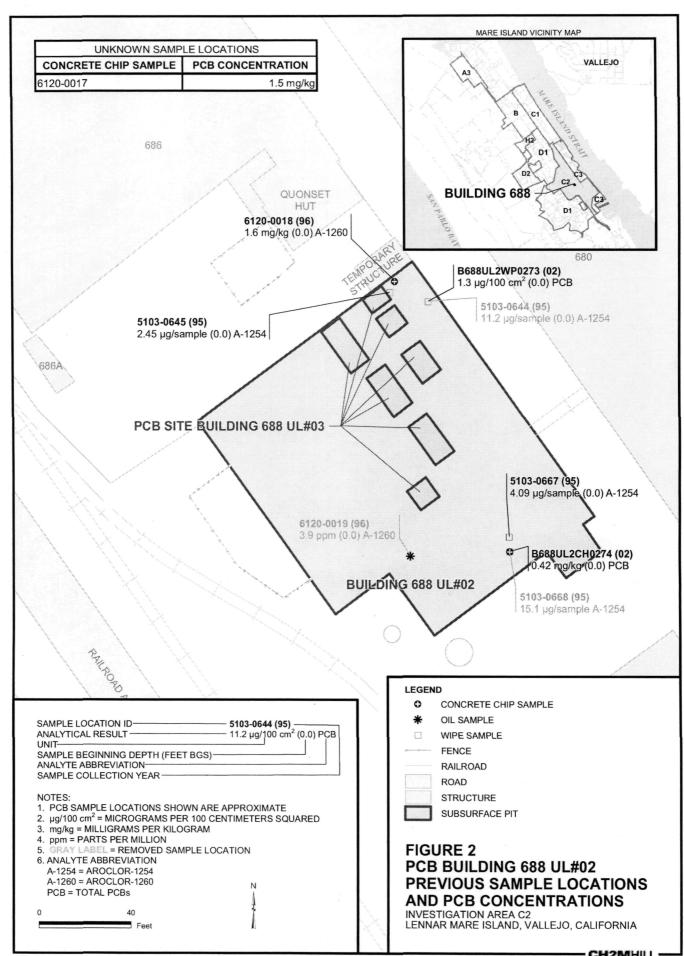
PCB Site Name	Site Description	Sample Number	Sample Matrix	Sample Date	Total PCB Concentration	Comments
Building 688 UL#02	Interior of Building 688	5103-0644	Concrete wipe	04/14/1995	11.2 μg/sample	Stain in northern portion of building; removed per TWD 95-0328; Aroclor-1254
		5103-0645	Concrete wipe	04/14/1995	2.45 μg/sample	Collected from southern portion of building; Aroclor-1254
		5103-0667	Concrete wipe	04/17/1995	4.09 μg/sample	Collected from southern portion of building; Aroclor-1254
		5103-0668	Concrete wipe	04/17/1995	15.1 μg/sample	Stain in southeastern portion of building; removed per TWD 95-0340; Aroclor-1254
		6120-0017	Concrete chip	04/1996	1.5 mg/kg	Unknown location inside Building 688; Aroclor-1260
		6120-0018	Concrete chip	04/30/1996	1.6 mg/kg	Stain in northern portion of building; Aroclor-1260
		6120-0019	Oil	04/1996	3.9 ppm	Oil sample from starting compensator (removed); Aroclor-1260
		B688UL2WP0273	Concrete wipe	06/28/2002	1.32 μg/100 cm ²	Verification sample associated with cleanup of 5103-0644
		B688UL2CH0274	Concrete chip	06/28/2002	0.42 mg/kg	Verification sample associated with cleanup of 5103-0668

mg/kg μg/100 cm² ND

milligrams per kilogram micrograms per 100 square centimeters not detected (laboratory reporting limit) parts per million polychlorinated biphenyl

ppm PCB





MARE ISLAND NAVAL SHIPYARD YARD ROUTE SLIP

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CODE	БҮ	DATE	TWD# 328 BLDG# 688
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106.4FP	P&2	915	APPROVAL
-186-1			GONCURRENCE (WHEN REQUIRED)
106-2			CONCURRENCE (WHEN REQUIRED)-
106.32	wiff	5/15/45	CONCURRENCE
			ITEM#_70ZM ON 106.04 SURVEY REPORT
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MINS 5216/24 (REV 1-85)



PCB DECONTAMINATION TECHNICAL WORK DOCUMENT (TWD)

PCB	CONT	'AMINA'	TED I	MACHINE	NO	FLOOR	STAIN-	88
					Timm		***************************************	

TWD NO. 95-0328

BLDG NO. 688

MARE ISLAND NAVAL SHIPYARD VALLEJO, CALIFORNIA

Prepared by: BRAC Environmental Technical Division Code 106 4 Vallejo, Calif. 94592

Distribution:

300EC

30**0CC**

106.4

106.32

PCB DECONTAMINATION TECHNICAL WORK DOCUMENT

INITIAL ISSUE

		Date
Prepared by:		
	Code 196.4	
Reviewed by:	Vennis 700-1	<u>6-15-95</u>
	Code 105.4	*
Approved by:	Meure	6/11/45
	Code 106.4 (Project Manager)	
Concurrence:	Weller Holory	5-15-95
	Code 106.32	

Rev.	Description	Approval	Date
		. [

1.0 Purpose

1.1 The purpose of this TWD is to decontaminate stained concrete floor area of building 688, (1st floor). The stain is located in the northeast side of building 688 (see sketch on enclosure 3). The stain contains 11.2 ug/100 sq. cm. for sample 5103-0644. The result exceeds the acceptable PCB level of 10 ug/100 sq. cm. (see enclosure 1) as described in reference 3.2. The sample number should be marked near the sample location. Code 106.4 shall be contacted at 6-7657 if sample number is missing from the area.

2.0 Description

2.1 The floor oil stain shall be decontaminated using the procedures required by this TWD.

3.0 References

- 3.1 NAVSHIPYDMAREINST 5100.36 -- Shipyard Occupational Safety and Health Workplace Manual, Mare Island Naval Shipyard, Occupational Safety, Health, and Environmental Office -- Code 106
- 3.2 Workplan PCB Decontamination for Spill Sites, Mare Island Naval Shipyard, Code 106.4.
- 3.3 Mare Island Naval Shipyard Environmental Protection Manual of 1 February 1994

4.0 Health & Safety Section / General Notes

4.1 All work performed shall be in strict adherence to the shippard Occupational Safety and Health (OSH) Manual (reference 3.1) the General Health & Safety Plan, Section 4 of reference 3.2., and the Health and Safety Section of this TWD.

- 4.2 At least two people shall be present at all times while chemical or physical hazards exist and access is being controlled to the PCB Work Area.
- 4.3 Personal protective equipment (PPE) shall be as follows:

Saranex coated tyvek coveralls

Viton gloves with latex gloves worn over them

Steel toed boots (if worn without coverings shall be washed with detergent and rinsed).

Nitrile or neoprene foot coverings may be worn over steel toed boots.

Face shield (8' minimum) with vented goggles (while cleaning)

4.4 Workers performing decontamination shall have received the following training as a minimum:

PCB Handling Controls (course YJ-B010)

Hazcomm (course YJ-A552)

- 4.5 The main hazard at the site is PCBs on the floor. Slip and top hazards are existent due to raised floor from water damage. Ventilation is adequate as the building is vacant and is large, and this will provide fresh air.
- 4.6 Temperatures above 100 degrees are not expected, nor is any hot work authorized, so PCBs will not be airborne.
- 4.7 Site access shall be controlled using the following areas:
 - Hot Zone The area of the spill site. Personnel entry to the hot zone shall be minimized. The area to be decontaminated and disposed of is the hot zone plus the buffer zone.
 - •Buffer Zone A one (1) foot wide area adjacent to and surrounding the hot zone.
 - •Warm Zone An area approximately three (3) feet by six (6) feet near the hot zone established by this TWD. The warm zone shall be used for exiting PPE decontamination procedures. The warm zone shall be established prior to beginning decontamination.

These areas shall be posted to exclude unauthorized personnel and the building shall be locked when not in use.

- 4.8 An emergency eyewash station with a 15 minute minimum capacity shall be accessible in 10 seconds or less from the work area.
- 4.9 Phone numbers are as follows:

Hospital: 9-911 or 646-4444

Ambulance: 9-911 or 646-4444

Spill team:

Emergency:

646-0182 or 0183

Fire: 9-911 or 646-3333

Police: 9-91

9-911 or 646-2222

Project Mgr.: 646-5945

- 4.10 Contact Code 106.4, L. Ramey at 6-7657 immediately after the floor decontamination. Resampling after decontamination is required by Code 106.4.
- 5.0 Decontamination Procedures

5.1 Support Area (Personal Decontamination)

9-911

Personal decontamination is required for PPE and cleaning equipment that comes in contact with PCB contaminated surfaces or PCB contaminated cleaning fluid and materials. Personal decontamination shall be performed in the warm zone, as defined in Section 4.7, and shall be performed in accordance with Section 4.9 of reference 3.2. The floor of the warm zone and routes between the warm zone and the hot zones shall be covered with plastic drop cloths to avoid spread of contamination.

5.	2	14	9	P	F	ก	ri	m	ς

Code 106.4 will provide minimum specific health and safety information in Section 4.0 of each TWD. This information in most cases will be sufficient. Personal preferences regarding PPE and communication methods, and changes at the decontamination site from the time the TWD was written to when the decontamination is accomplished/completed may cause a change to the health and safety information provided. Therefore, the On-Site Health and Safety Coordinator, just prior to and during decontamination, shall review HSP forms 4.6, 4.15 and 4.16 of reference 3.2 and complete forms if: 1) one of the conditions mentioned in the previous sentence exist or 2) the TWD does not cover an item, e.g. communications, on HSP form 4.16. Any down grading of health and safety information (PPE and air monitoring) will only occur upon written approval of Code 106.4. HSP Acceptance Form 4.17 (enclosure 2), must be completed and signed by each person performing decontamination.

5.3	Sampling Evolution (Place an <u>x</u> or number Initial Sampling <u>X</u> Resampling		
5.4	Specific Instructions: Perform decontamination of floor stain in accomstructions set forth in reference 3.2, section requirements as follows: Before starting deconouble wash /rinse entire stain on concrete a or non-lonic surfactant solution following ste (including rags, gloves, etc.) shall be package contaminated waste. Properly contain, store debris, absorbents, rags, and other materials Latest disposal requirements are in reference.	n 2, paragraph 2.5.1, and the specifical move work bench out of the way area with industrial strength deterge ps in paragraph 2.5.2.1. All waste led and handled as PCB is label and dispose of contaminated is resulting from the decontamination	ic ni
	Other Instructions Resampling is required (see paragraph 4.10) sample of the concrete area		
5.6 5.6.1	The shop performing the deconfamination shadecontamination conforms to this TWD. 1 Code 300EC performed decontamination of required.		
	Code 300EC	Dale	
	Return completed information package (TWI to the project engineer, Code 106.4 PCBs, E		1
	Code 106.4 Engineering Review and Appropriate Control of the Contr	oval and Resampling Results	
	Code 106.4 conduct review and approval of a decontamination conforms with requirement	information package. Floor oil stain its of this TWD.	1
	Code 106.4	Date	

6.2	Code 106.4 review and acceptance of resampling results. For results to be satisfactory they must be \leq 10 $\mu g/100$ sq. cm. for wipe samples and \leq 50 ppm for other samples where no release to the environment has occurred. Results are:						
	Remarks:						
	Code 106.4	Date					
7.0	Enclosures (1) Sample Results (2) Health And Safety Plan (3) Sketch	Acceptance Form					



ANALYTICAL REPORT

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All results are reported in jug/sample.

Sample Number: 5897-95 (688/05-F2/floor oil stein #) $\subseteq \{ (i,j) \mid \phi_{so}(i,j) \}$

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Milhan

ENCLOSURE

Health And Safety Plan Acceptance Form

at the PCB wor	k area. Attach the completed forms to the TWD.
TWD No.:	95-0328
PCBCM#: _	FLOOR STAIN 88
By my signatur	e below, I acknowledge that I have read and understand the contents of
the Health & Sa	afety Plan for this project. I agree to perform my work in accordance
with the Health	and Safety Plan.
Signatu	re
Print Na	ıme
Code	
Date	
By my signatur	e below. I acknowledge that I have read and understand the contents of
the Health & S	afety Plan for this project. I agree to perform my work in accordance
with the Health	and Safety Plan.
Signatu	ire
Print No	ame
Code	
Date	

INSTRUCTIONS: This form is to be completed by each person prior to beginning work

Enclosure 2

PRINTING 688 SHOP ST PUMB VERY PAGESTAR

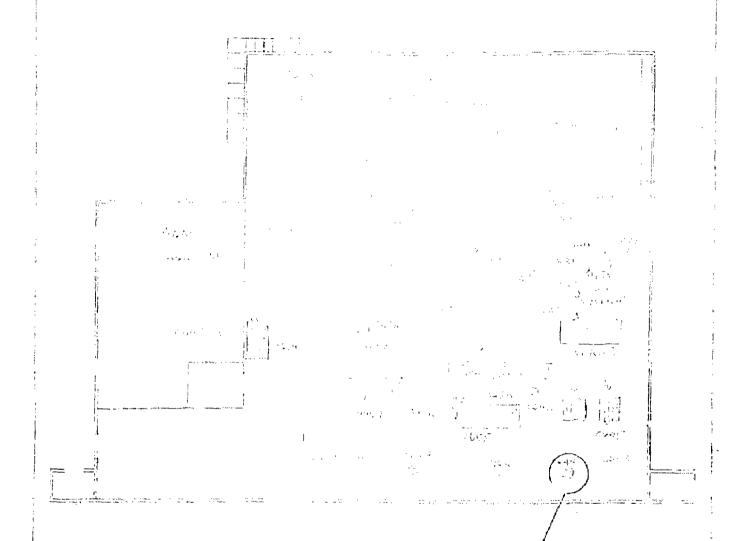


图2005年6月1日 李林区 1998年12月4日 4月4日 李州区 外的原则

FLOOR STAIN

EAMPLE NO. 5103-0644

ROUND &4" DIA(RED PAINT) HORTH

> MARTE ESCAMP HIDG 688 ENCLOSURE (1) SHEET 7 OF 8

ENCLOSURE 3

MARE ISLAND NAVAL SHIPYARD YARD ROUTE SLIP

106.4PC	B	HAME	L. RAMEY	Ex	261 530# 6-7657	CATE
	TOTE DESCUSSEE MENT/CONG	o [FILE	PREPARE FOR SIGN REPORT BACK	•	RETURN
TO CODE	INITI.	DATE	SUBJECT REQUES	ST FOR TWD	ACTION	
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ANALYTICAL REPORT

Mare island Navai Shipyard	Date Sampled	0303.55
Code 106 14, Stop T-56	Date Received.	04/25/95
Building 1345	Date Extracted	04/28/95
Vallejo, CA 94592-5100	Date Analyzed:	05/13/95
	Work Order No.	95-04-516
Attn: Tammi Krafzel	Method.	EPA ELSO (PCBs)
RE: Contract No. N00123-92-D-4011	Page 12 of 20	

All results are reported in ug/sample

Sample Number: 5897-95 (688/05-F2/floor oil stain #) $\tilde{\mathbb{Z}}[\mathbb{Z}/\mathbb{Z}_2] \cup \mathbb{Z}_2 \cup \mathbb{Z}_2$

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Aroclar-1248	MT	0.1
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Arodor- 1260	MCI	0.1
Arodor-1262	MFI	Ç. 1 Ö. 1
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Arador-1221	NO	Q. i
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Arcelor-1242	NC	
Arocior 1248	ND	0.1
Araclar-1254	2.46	C 1
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PCB SURVEY AND SAMPLE DATA SHEET (ADDON SHEET)

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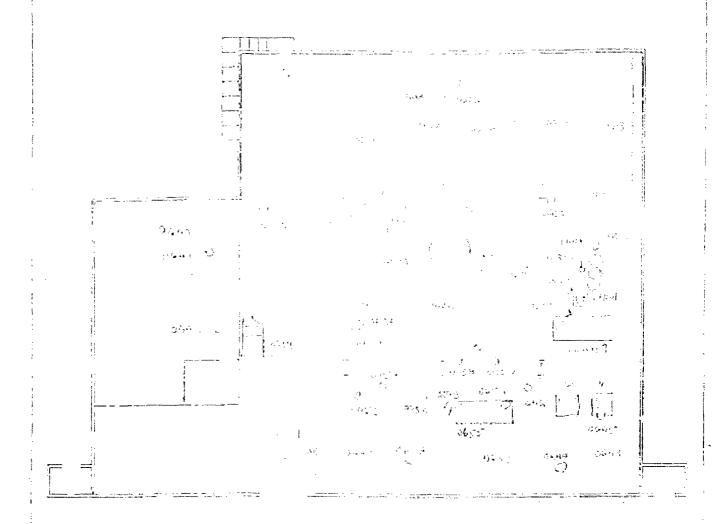
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MARE ISLAND BLDG 688 ENCLOSURE (1

ENCLOSURE (1)
SHEET 7 OF 8

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MARE ISLAND NAVAL SHIPYARD YARD ROUTE SLIP

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PCB DECONTAMINATION TECHNICAL WORK DOCUMENT (TWD)

PCB CONTAMINATED MACHINE	NO	FLOOR	STAIN-88
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TWD NO. <u>95-0340</u>

BLDG NO. <u>688</u>

MARE ISLAND NAVAL SHIPYARD VALLEJO, CALIFORNIA

300CC 106.4 106.32

Prepared by:	Distribution:
BRAC Environmental Technical Division	
Code 106.4	
Vallejo, Calif. 94592	

PCB DECONTAMINATION TECHNICAL WORK DOCUMENT

INITIAL ISSUE

		Date
Prepared by:	Daugha Wooten	0/16/05
	Code 106.4	/ . /
Reviewed by:	A heteric Tool	6-16-75
	Code 106:4	
Approved by:	Pefaine	8,110/95
•	Code 106.4 (Project Manager)	
Concurrence:	Walayan Jakafan	6/11/25
	Code 106 32	

Rev.	Description	Approval	Date

1.0 Purpose

1.1 The purpose of this TWD is to decontaminate stained area on the painted concrete area of building 688, (1st floor). The stain is located in the southeast end of building 688 (see sketch on enclosure 3). The stain contains 15.1 ug/100 sq. cm. for sample 5103,0668. The result exceeds the acceptable PCB level of 10 ug/100 sq. cm. (see enclosure 1) as described in reference 3.2. The sample number should be marked near the sample location. Code106.4,B.Turner shall be contacted at 6-2471 if sample number is missing from the area.

2.0 Description

2.1 The floor oil stain shall be decontaminated using the procedures required by this TWD.

3.0 References

- 3.1 NAVSHIPYDMAREINST 5100.36 Shipyard Occupational Safety and Health Workplace Manual, Mare Island Naval Shipyard, Occupational Safety, Health, and Environmental Office – Code 106.
- 3.2 Workplan PCB Decontamination for Spill Sites, Mare Island Naval Shipyard, Code 106.4.
- 3.3 Mare Island Naval Shipyard Environmental Protection Manual of 1 February 1994

- 4.0 Health & Safety Section / General Notes
- 4.1 All work performed shall be in strict adherence to the shipyard Occupational Safety and Health (OSH) Manual (reference 3.1) the General Health & Safety Plan, Section 4 of reference 3.2., and the Health and Safety Section of this TWD.
- 4.2 At least two people shall be present at all times while chemical or physical hazards exist and access is being controlled to the PCB Work Area.
- 4.3 Personal protective equipment (PPE) shall be as follows:

Saranex coated tyvek coveralls

Viton gloves with latex gloves worn over them

Steel foed boots (if wom without coverings shall be washed with detergent and rinsed).

Nitrile or neoprene foot coverings may be worn over steel toed boots.

Face shield (8" minimum) with vented goggles (while cleaning)

4.4 Workers performing decontamination shall have received the following training as a minimum:

PCB Handling Controls (course YJ-B010)

Hazcomm (course YJ-A552)

- 4.5 The main hazard at the site is PCBs on the floor. Ventilation is adequate as the building is vacant and is large, and this will provide fresh air.
- **4.6** Temperatures above 100 degrees are not expected, nor is any hot work authorized, so PCBs will not be airborne.
- 4.7 Site access shall be controlled using the following areas:
 - Hot Zone The area of the spill site. Personnel entry to the hot zone shall be minimized. The area to be decontaminated is the hot zone plus the buffer zone.
 - •Buffer Zone A one (1) foot wide area adjacent to and surrounding the hot zone.
 - •Warm Zone An area approximately three (3) feet by six (6) feet near the hot zone established by this TWD. The warm zone shall be used for exiting PPE decontamination procedures. The warm zone shall be established prior to beginning decontamination.

These areas shall be posted to exclude unauthorized personnel and the building shall be locked when not in use.

- 4.8 An emergency eyewash station with a 15 minute minimum capacity shall be accessible in 10 seconds or less from the work area.
- 4.9 Phone numbers are as follows:

Hospital: 9-911 or 646-4444

Ambulance: 9-911 or 646-4444

Spill team:

646-0182 or 0183

Fire: 9-911 or 646-3333

Police:

9-911 or 646-2222

Project Mgr.: 646-5945

Emergency: 9-911

- 4.10 Contact Code 106.4, B.Turner at 6-2471 immediately after the floor decontamination. Resampling after decontamination is required by Code 106.4.
- 5.0 Decontamination Procedures

5.1 Support Area (Personal Decontamination)

Personal decontamination is required for PPE and cleaning equipment that comes in contact with PCB contaminated surfaces or PCB contaminated cleaning fluid and materials. Personal decontamination shall be performed in the warm zone, as defined in Section 4.7, and shall be performed in accordance with Section 4.9 of reference 3.2. The floor of the warm zone and routes between the warm zone

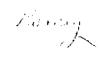
and the hot zones shall be covered with plastic drop cloths to avoid spread of contamination.

5.2 HSP Forms

Code 106.4 will provide minimum specific health and safety information in Section 4.0 of each TWD. This information in most cases will be sufficient. Personal preferences regarding PPE and communication methods, and changes at the decontamination site from the time the TWD was written to when the decontamination is accomplished/completed may cause a change to the health and safety information provided. Therefore, the On-Site Health and Safety Coordinator, just prior to and during decontamination, shall review HSP forms 4.6, 4.15 and 4.16 of reference 3.2 and complete forms if: 1) one of the conditions mentioned in the previous sentence exist or 2) the TWD does not cover an item, e.g. communications, on HSP form 4.16. Any down grading of health and safety information (PPE and air monitoring) will only occur upon written approval of Code 106.4. HSP Acceptance Form 4.17 (enclosure 2), must be completed and signed by each person performing decontamination.

	Sampling Evolution (Place an <u>x</u> or number on applicable line) Initial SamplingX Resampling (1,2,3,etc.)
	Perform decontamination of floor stain in accordance with the applicable general instructions set forth in reference 3.2, section 2, paragraph 2.5.1, and the specific requirements as follows: Double wash / rinse entire stain on concrete area with industrial strength detergent or non-ionic surfactant solution; following steps in paragraph 2.5.2.1. All waste shall be packaged and handled as PCB contaminated waste. Properly contain, store, label and dispose of contaminated debris, absorbents, rags, and other materials resulting from the decontamination. Latest disposal requirements are in reference 3.3 (Chapter 9, 4.c.(1).
5.5	Other Instructions Resampling is required (see paragraph 4.10) Code 106.4 shall take a swipe sample of the concrete area
	The shop performing the decontamination shall sign below to certify that the decontamination conforms to this TWD. Code 300EC performed decontamination of floor oil stains in building 688 as required.
	Code 300EC Date
	Return completed information package (TWD and HSP forms) for this floor stain to the project engineer, Code 106.4 PCBs, Building 521, second floor.

	Code 106.4 Engineering Review and Approval eptance	and Resampling Results
6.1	Code 106.4 conduct review and approval of information conforms with requirements of	
	Code 106.4	Date
6.2	Code 106.4 Code 106.4 review and acceptance of resampling satisfactory they must be ≤ 10 μg/100 sq. cm. for other samples where no release to the environment Results are: ☐ SAT ☐ UNSAT (remarks:	wipe samples and < 50 ppm for ent has occurred. irks required)
•	Code 106.4	Date
	Code 100.4	D.016
7.0	Enclosures (1) Sample Results (2) Health And Safety Plan Acceptance Form (3) Sketch	





ANALYTICAL REPORT

Mare Island Naval Shipyand	Pate Sampled	04/17/95
Code 106 14, Stop 7-56	Date Receivee:	04/25/95
Building 1345	Date Extracted:	04/28/95
Vallejo, CA 94592-5100	Date Analyzed:	06/05/95
•	Work Order No.	95-04-517
Attn Tammi Kratzet	Methad	EPA 8080 (PCBs)
RE: Configor No. N00123-92-D-4011	Page Fol 6	

All results are reported in ag/sample.

Sample Number: -5978-95 (688/05-F2/misc & oil stain #)

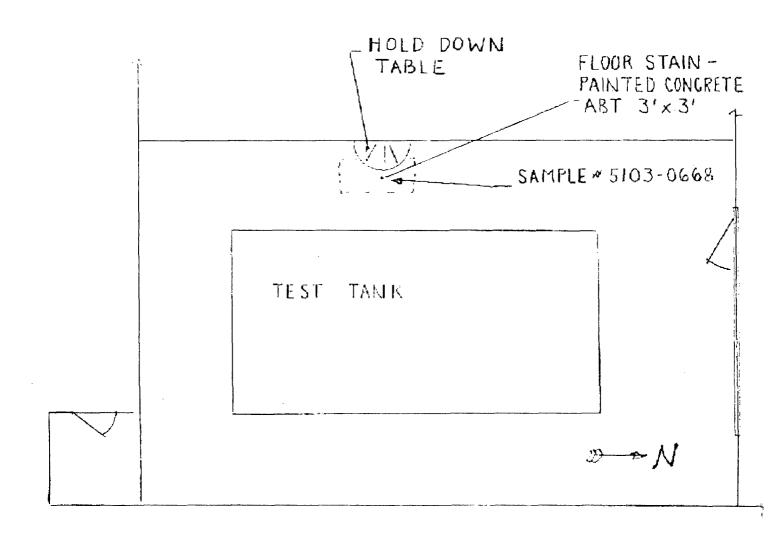
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Aroclor-1232	MD	0.1
Araclor-1242	NC	0.1
Arcolor-1248	$M\!D$	0.1
Arodlor-1254	4.09	0.1
Arocior-1260	ND	0.1
Aroclor-1262	ON	0.1
Sample Number:	5979-95 (688/05-F2/misc & oil stain #)[S/⊙3-	0668]
Aroclor-1016	NΩ	0.1
Aroclor-1221	ND	0.1
Aroclor-1232	ND	0.1
Aroclor-1242	ND	0.1
Aroclor-1248	ND	0.1
Aroclar-1254	15.1	0.14
Aroclar-1260	ND	0.1
Aroclor-1262	ND	0.1

Health And Safety Plan Acceptance Form

al the PCB work	area. Attach the completed forms to the TWD.
TWD No.:	95-0340
PCBCM#:	FLOOR STAIN -88
	below, I acknowledge that I have read and understand the contents of
•	fety Plan for this project. I agree to perform my work in accordance
with the Health	and Safety Plan.
Signatu	e
Print Na	me
Code	
Date	
	below, I acknowledge that I have read and understand the contents of
	fety Plan for this project. I agree to perform my work in accordance
with the Health	and Safety Plan.
Signatu	е
Print Na	me
Code	
Date	

INSTRUCTIONS: This form is to be completed by each person prior to beginning work

Enclosure 2



PLAN VIEW
BLDG. 688-SOUTH EAST CORNER
OF BUILDING

SKETCH- FLOOR STAIN BLDG. 688

MARE ISLAND NAVAL SHIPYARD YARD ROUTE SLIP

106.4P0	B	NAME	L. RAMEY		6-7657	PATE			
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ANALYTICAL REPORT

Mare Island Naval Shipyard	Date Sampled:	04/17/95
Code 106.14, Stop 1-56	Date Received	04/25/95
Building 1345	Date Extracted	04/28/95
Vailejo, CA 94592-5100	Date Analyzed:	96/05/95
	Work Order No :	95-64-517
Attn: Tarumi Kratzel	Method:	EPA 8980 (PCBs)
RE: Contract No. N00123-92-D-4011	Page 1 of 6	·

All results are reported in pg/sample.

Sample Number: 5978-95 (688/05-F2/misc & oil stain #)

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Aroclor-1262	ND	0.1
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MANLAMA

CHAIN OF CUSTODY RECORD dtd 04/17/95

95-m-0905

Dor Num 51070435 Page 1 of 2

(fac:

Date:

ADDRESS BLOCK

from Termi Kratzel MINSY Code 106,14 Stop 756 Blds 1245 Vallejo, CA 94592-5100

Relinquished by: (Signature)

To Cal Science Environmental laboratories, Inc. Stanick CA -90680

Net (714) 695-5494 Fax (714) 894-7501 Tel (707) 646-0181 Fax (707) 646-0184 INSTRUCTION BLOCK written OC Report Required? Turnaround Time: (X) Routine GC (1 RM3CS [] Same Day [] 24 Hrs [] 48 Hrs [] 5 Days [X] 10 Days [] Rush PCB SAMPLE DATA BLOCK 0106.14 C106.4 Solid/Soit Num Cont Sample Sample Sampling Oil Water Cont Size Analysis Required Location/Parcel/Coscription Humber Grab Grab Filter 5978-95 5103-0667 688/05-FZ/misc & oil stain # [1] : 40ml) 358TXP 04/17/95 8:00 [) [] 5979-75 \$103.0668 688/05-82/misc & out attain # 04/17/95 8:15 [] [] EX3 [1] (45%) 100mm 5980-95 5103-0669 688/05:F2/misc & oil stein # (1) [40mi] 300-ep E4/17/95 8:30 [] [] 5981-95 5103-0670 688/05-FZ/misc & oil stain # (1) [40ml] 30014H 04/17/95 8:45 (X) (3) 5782 75 5103-0671 688/05-\$2/misc & all stain # [1] (40ml] 300140 04/17/95 9:00 [] [] 1X ! 5983-95 5103-0672 608/05-67/mise & oit stain # (1) (40ml) 3004P U4/17/95 9:15 () () [X] 5984-95 5103-0673 688/05-FZ/mise & oil-stain # (1) [40ml) 100140 04/17/95 9:30 [] [] (8) 5.785 55 5103-0674 688/05-FZ/misc & ail stain # MANK 04/17/95 9:45 [] [] [X] 7(3) (1) 1 40m() 100mAP 5786-95 5103-0676 688/05-F2/mise cit stain # " 04/17/95 10:00 () [] [1] [40ml] 100mp 5987-95 5103-0677 688/05-FZ/misc off stain # [1] [40mi] 10014# 04/17/95 10:15 (1 (1 (X) Type: [1] swipe mm ext. [2] swipe spill. [3] swipe/deav int. [4] solid spill. [5] bill res mm. [6] water grab. [7] bill's CHAIN OF CUSTODY RECORD Data Transferred by: (\$ignature) 1500 Received by: (Signature) Relinquished by: (Signature) -Received by: (Signature) Relinquished by: (Signature) ピップラスション ひんざ Time: Relinquished by: (Signature) Received by: (Signature) Date:

Received for Laboratory: (Signature)

PCB SURVEY AND SAMPLE DATA SHEET (ADDON SHEET)

Bldg (N) Hear (Colone) Rop Wood ____

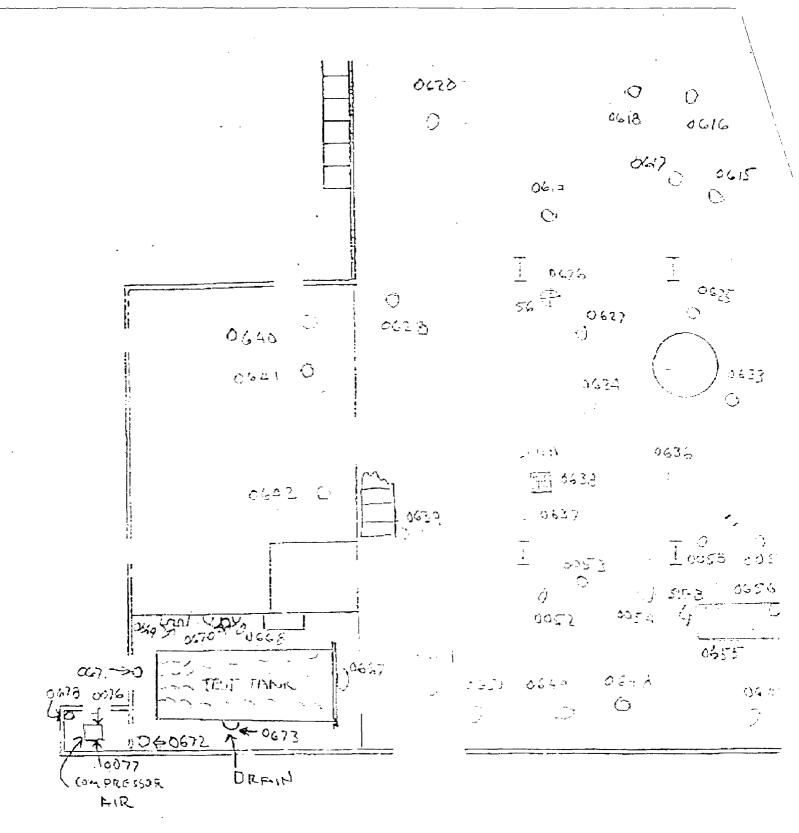
DÉSCRIPTION BLOCK

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APLE DATA BI	CCK								,
	Sample 10	Date	Liga	Cil Grab	Hater Grab	Solid/Sort Filter	Турс	Eont Size	Remarks
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	5103-0569	म् स्रोता स्	7, 3	ŧ i	7.1	(*4	0.9.1	1 40	Margaret Proper Porter
	5103-0670	4-17-15	¥ 1.	14	: :	1)	1,71	t 38.1	magning or I to p
	5103-0671	4-11-35	·	1	1)	47)	(to)	14 1	Frank Charleson Conse
	5103-0672	4-17-55	· ·	(;		2 F	14.1	(es) 1	5 ·
	5103-0673	80 - 1 1 de 2	y ; ; .	::	1 ?	1.2-	1:1	Long 1	Disable Brown Sugar
	5103-6674	4-17-65	9.11.	, ti	į 1	\$3. }~	(7.1	1+x + 1	1.1.14 K) <
	5103-0675	Not us	(<u>=1)</u>	. 11	t :	1.1	; 1	1 !	La vaco
e: []] swij	pe am ext,	(21 swipe sp	itt, (3) swi	po ne	ov int,	[6] solid s	pill, (5)	oit rés	em, (6) water grab, (7) bla
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BLGCK						FAMILIANDER, AC. ACCOUNTERED TO TO T			a supplementation of the second secon

Desc Manuf Ser Nun

Samples were taken, labeled, sealed, recorded, stored and secured from tampening by unauthorized personnel as required by: Section 3 of "Work Plan PCB Survey and Sampling For Nechanical Machinery"; or "Work Plan PCB Survey and Sampling For Possible Spill Sites".

Name Oyel Tarlo	Badge Num Start 1 Date 4/2.95
Nore Pou Culad	Badge Num [732.60] Date (1-77-674)
None Off 1991	Badge Num 10 71 Date 4/1/67



FACILITY AND PRODUCTION EQUIPMENT FIRST FLOOR

5103 SERIES SAMPLE #15